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11 UNITED STATES DISTRICT COURT

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13 DISTRICT OF NEVADA

14 10 EMPIRE FIRE AND MARINE INS. CO.,) Case No.: 2:21-cv-00289-JCM-EJY
15 Plaintiff,)
16 vs.) STIPULATION TO EXTEND DISCOVERY
17 NICOLE ELYSE BROOKS, et al.) DEADLINE
18 Defendants.) THIRD REQUEST

19 Plaintiff Empire Fire and Marine Ins. Co. ("Plaintiff") and Defendants Jose Rodriguez,
20 Jacob Ramirez and Jose Luis Tello-Robles (collectively "Defendants"), by and through counsel,
21 stipulate and agree as follows:

22 WHEREAS, this matter is an insurance coverage dispute arising from a two (2) vehicle auto
23 accident which involved a vehicle Defendant Nicole Brooks ("Brooks") rented from Malco
24 Enterprises of NV, dba Budget Rent A Car of Las Vegas ("Budget") in which Plaintiff alleges the
25 accident may have been staged;¹

26 WHEREAS, this court has previously extended the discovery deadline in order to, inter alia,
27 permit for Plaintiff to complete the depositions of third party witnesses Calvin Tucker and Gheta
28 Elliott, each of whom have been served with subpoenas;

29 WHEREAS, despite best efforts, scheduling conflicts continue to arise such that neither

30 ¹ As Brooks has not appeared, this Court has entered her default. Dkt. No. 17.

1 deposition has been completed;

2 WHEREAS, the parties are able to proceed with the deposition of Gheta Elliott on May 5,
3 2022;

4 WHEREAS, the parties are able to proceed with the deposition of Calvin Tucker on May 16,
5 2022;

6 WHEREFORE, the parties are amenable to extending the discovery deadline until May 16,
7 2022 to complete these depositions.

8 IT IS SO STIPULATED.

9 Dated: April 30, 2022

10 MORALES FIERRO & REEVES

11 GEORGE T. BOCHANIS, LTD.

12 By: /s/ William C. Reeves
13 William C. Reeves
14 MORALES FIERRO & REEVES
15 Attorneys for Plaintiff

By: /s/ Eunice Beattie
Eunice Beattie
GEORGE T. BOCHANIS, LTD.
16 Attorneys for Defendants

17 The Court, having considered the Stipulation of the parties and good cause appearing, agrees
18 to extend the deadline to complete discovery to May 16, 2022 to complete the depositions of
19 Gheta Elliott and Calvin Tucker.

20 IT IS SO ORDERED:

21 Dated: May 2, 2022

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23 UNITED STATES MAGISTRATE JUDGE

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